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From: CN=David Powers/OU=R10/O=USEPA/C=US
Sent: Thur 5/3/2012 9:10:09 PM
Subject: Fw: CZARA and Oregon's agriculture program
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NOAA just called me and said they haven't received internal feedback yet from NOAA folks so waiting for Jayne's jury duty to run its course is probably ok. Allison liked the idea of keeping the response letter short and sweet and the latest version I saw looked good. Allison also thought that it made sense to thank Nina for both the IR TMDL letter and the Ag letter in our response so we don't need to go through the drill again. I'm out tomorrow but back in next week. Have a great weekend.

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----- Forwarded by David Powers/R10/USEPA/US on 05/03/2012 02:05 PM -----

From: David Powers/R10/USEPA/US
To: Jennifer Wu/R10/USEPA/US@EPA, David Croxton/R10/USEPA/US@EPA, Jayne Carlin/R10/USEPA/US@EPA, Don Wayne/DC/USEPA/US@EPA, Alan Henning/R10/USEPA/US@EPA, Karma Anderson/R10/USEPA/US@EPA, Rick Seaborne/R10/USEPA/US@EPA
Cc: Anthony Barber/R10/USEPA/US@EPA, Mike Bussell/R10/USEPA/US@EPA
Date: 05/02/2012 03:29 PM
Subject: Fw: CZARA and Oregon's agriculture program

Attached is a letter from NWEA that raises concerns about EPA/NOAA approval of the OR's CNPCP management measures for agriculture.

EPA and NOAA have not been able to approve the following three areas of OR's CNPCP: Management measures for new developments &, OSDS and additional management measures for forestry. A few dozen other areas of the OR CNPCP have been "approved" (highways & bridges, monitoring, agriculture, marinas, etc.) and NOAA and EPA have been waiting for the State to address the three outstanding areas of the CNPCP before making a final determination on OR's CNPCP.

I haven't read NWEA's 33 page letter yet but a quick skim indicates that NWEA believes that OR's nonpoint source program for agriculture should not be approved. Although we haven't made a final determination on OR's CNPCP the only issues we've raised with the State for the past several years relate to conditions for new developments & OSDS and additional management measures for forestry. Forestry has been the primary focus of NWEA and the settlement agreement does not mention agriculture. I should note the mid-coast implementation ready TMDL will address agriculture as well as other sectors in the mid-coast basins. So will IR TMDLs for other coastal basins.

NOAA and EPA are working on a response to NWEA prior letter....should be consider using that response for the attached NWEA letter too?

p.s. I've included Karma and Rick because ag is the focus of the latest NWEA letter and we may run in to similar issues related to a final decision on WA's CNPCP.

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From: "Nina Bell" <nbell@advocates-nwea.org>
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Date: 05/02/2012 11:41 AM
Subject: CZARA and Oregon's agriculture program

Please find a letter attached concerning EPA and NOAA's interim approval of Oregon's agricultural coastal nonpoint pollution program.

Nina

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[attachment "CZARA agriculture letter 5 2012.pdf" deleted by Jennifer Wu/R10/USEPA/US]